

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, California 95814



May 9, 2008

Philip Browning, Director
County of Los Angeles, Department
of Public Social Services
12860 Crossroads Parkway, South
City of Industry, CA 91746-0000

Dear Mr. Browning:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of March 24 – 27, 2008. Enclosed is the final report on the review.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a request since our report is a public document. If you would like us to include a copy of your corrective action plan when responding to these requests, please indicate this when submitting your plan.

If you need technical assistance in the development of your plan, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ramon S. Lopez", with a horizontal line extending to the right.

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Steve Hemmerling, CDSS Food Stamps
Field Operations Bureau
Corrective Action/Management Evaluation Unit, M.S. 16-32

Mike Papin, CDSS Food Stamps
Food Stamps Policy Bureau/Policy Development Unit, M.S. 16-32

Sheri Lewis, Management Information & Evaluation, LADPSS

Robert Miletich, Civil Rights & Customer Relations Section, LADPSS

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES COUNTY
DEPARTMENT OF PUBLIC SOCIAL SERVICES**

Conducted March 24 - 27, 2008

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, MS 15-70
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Reviewer

Mary Rockwood

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Los Angeles County Department of Public Social Services (LADPSS) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

Interviews with selected public contact staff were held in advance of an on-site review, which was conducted on March 24 -27, 2008. An exit interview was held with LADPSS managers and administrative staff on March 27, 2008.

The review was conducted in the following locations:

District	Facility Address	Programs Reviewed	Languages spoken by a substantial number of clients
South Family	17600 "A" Santa Fe Ave. Rancho Dominguez	CalWORKs & Food Stamps	English, Spanish, Cambodian, Vietnamese
West Valley	21415 Plummer St.. Chatsworth	CalWORKs & Food Stamps	English, Spanish, Armenian
Chatsworth IHSS	24615 Plummer St. Chatsworth	IHSS	English, Spanish, Armenian
Glendale	4680 San Fernando Rd. Glendale	CalWORKs & Food Stamps	English, Spanish, Armenian
San Gabriel Valley	3352 Aerojet Ave. El Monte	CalWORKs & Food Stamps	English, Spanish, Vietnamese, Cantonese, Mandarin

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2007-08 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
-

Below is a summary of the sources of information used for the report:

Interviews Conducted with Public Contact Staff

Classifications	Total	Bilingual
Eligibility Worker	13	(11)
Case Opening Clerk	2	(2)
Lobby Receptionist	1	(1)
Social Worker	3	(2)
Total	19	(16)

Case Files Reviewed (Total 123 cases)

English speakers' case files reviewed	0
Non-English or limited-English speakers' case files reviewed	123
Languages of non-English cases	Spanish, Armenian, Cambodian, Vietnamese, Korean, Farsi, Russian, Cantonese, Mandarin, Tagalog

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including any appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Any required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a discussion of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			On a case-by-case basis, scheduled appointments can be arranged.
Does the county have extended hours to accommodate clients?		X		See above
Can applicants access services when they cannot go to the office?	X			LADPSS has a Home Interview Program (HIP), which can be used when necessary; and both telephone and mail access is available.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs"?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

B. Corrective Action :

None required.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the ADAAG in the Corrective Action column refers to the federal Standards for Design, and the Title 24 of California Code and Regulations (T24 CCR) are also cited because there are instances when California state law is more stringent than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Facility Location # 1: South Family District – 17600 “A”, Santa Fe Ave Rancho Dominguez

Facility Element	Findings	Corrective Action
Parking	<ol style="list-style-type: none"> 1. Signage was not available to direct participants to designated accessible parking. 2. 1 of the 6 designated spaces did not have an access aisle provided (loading/unloading). 3. The words “No Parking” were not provided in the access aisles of the disabled parking spaces. 	<ol style="list-style-type: none"> 1. According to staff, a work order has been submitted to provide this directional signage. Follow-up is necessary to ensure completion. 2. Access aisles are to be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2; ADA 4.6.3) 3. “No Parking” is to be painted on the ground in each 5' or 8' aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2)

Facility Element	Findings	Corrective Action
Building Entrance	Pressure required to open the door measured approximately 14 pounds, which is in excess of the 5-pound limit for accessible buildings.	Ongoing adjustments are necessary to maintain door pressure as close to the 5 pounds required for accessible buildings. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Restrooms	The pressure of both the men's and women's restroom doors was too high (Women's 18/20 lbs. and men's 14 lbs.)	Adjustments are needed. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Interview Booth	There was an interview booth designated as accessible, however the knee clearance space was only 12" and work counter/shelf not really usable by someone in a wheelchair.	Minimum seating knee space is to be 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3)

Facility Location # 2: West Valley District – 21415 Plummer St., Chatsworth

Facility element	Findings	Corrective Action
Building Entrance	<p>Ongoing monitoring and adjustment of door pressure is in place according to input provided to the reviewer.</p> <p>Pressure required to open the door still measured approximately 10 pounds, which is in excess of the 5-pound limit for accessible buildings. It was noted, however, that security staff are stationed at the entrance and are available to assist as necessary.</p>	None required as long as the regular monitoring and adjustment of the pressure continues and assistance remains available at all times.

Facility element	Findings	Corrective Action
Restrooms	LADPSS is commended for providing push button automatic openers for both the men's and women's accessible restrooms in this district office.	

Facility Location # 3: Chatsworth IHSS Office – 21615 Plummer St., Chatsworth

Facility element	Findings	Corrective Action
Building Entrance	Pressure required to open the door measured approximately 15 pounds, which is in excess of the 5-pound limit for accessible buildings.	Ongoing adjustments are necessary to maintain door pressure as close to the 5 pounds required for accessible buildings. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Restrooms	The pressure of both the men's and women's restroom doors was too high (approx 14 lbs. and 10 lbs.)	Same as above.

Facility Location # 4: Glendale District - 4680 San Fernando Rd.

This facility was found to be exceptional in the provision of accessibility for the disabled and limited-English-proficient participant population. Signage and presentation of civil rights materials provided visible evidence to the participant population that the agency is sensitive to their needs and available to provide assistance as needed. Provision of accessible parking, interview booths designated with the international symbol of disability and modified service counters were available, as well as customer service staff to assist as needed.

It was evident that adjustments are made to the entrance door (which measured 8 pounds of pressure) and that maintenance should continue. Both the men's and women's restroom doors also were in excess of the 5-pound pressure maximum for accessible doors, and should be included in the routine maintenance schedule.

Facility Location #5: San Gabriel Valley District – 3352 Aerojet Ave., El Monte

This facility was found to be totally accessible as well, with the only issue being that of door pressure at both the entrance and each accessible restroom. Similar adjustment schedules need to be maintained to provide for limitations on the amount of force necessary to open the accessible doors – with 5 pounds established as the maximum..

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient). Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Each facility is staffed with customer service staff (greeters) as well as bilingual reception staff and there is a language card in use to assist in identifying a language the staff may be unfamiliar with.

Question	Yes	No	Some-times	Comments
				There are signs posted (in multiple languages) asking, "How May We Help?"
Does the county use a primary language form?	X			The Primary Language Designation Form, PA 481 is utilized.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			<p>LADPSS continues to provide a diverse workforce with a wide range of languages spoken by bilingual workers. There are excellent verbal bilingual services provided through a diverse workforce that allows the assignment of bilingual caseworkers to most non-English speaking participants. Co-workers or other staff are utilized as interpreters when a bilingual worker is not assigned.</p> <p><u>Note:</u> In the West Valley District Office (Chatsworth), there is currently a shortage of Spanish bilingual workers and focused recruitment is underway to provide relief to this situation.</p> <p>Shortcomings with the current LEADER automation system continue to limit the level of compliance with requirements for the provision of <u>written language services</u>, however. (See discussion following completion of this section's findings chart).</p>

Question	Yes	No	Some-times	Comments
After it has been determined that the client is limited-English or non-English speaking, what is the county process for procuring an interpreter?	-	-	-	In most cases, a bilingual worker is assigned. When this does not occur, the assigned worker utilizes co-workers or other staff to assist with interpretation. The Language Line is also an alternative, however, rarely needed.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			Bilingual workers are certified by the agency.
Does the county have adequate interpreter services?	X			Exception: It was noted above that West Valley (Chatsworth) is currently experiencing a shortage of Spanish bilingual workers and focused recruitment is underway in an attempt to alleviate that situation.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		

Question	Yes	No	Some-times	Comments
Does the county allow the client to provide his or her own interpreter?	X			According to staff, it is policy to allow participants to provide their own interpreters if they insist; however, the preference is for agency interpreters to be utilized to ensure effective communication.
Does the county use the CDSS-translated forms in the clients' primary languages?			X	Many of the translated forms are in use, however, LEADER-generated forms do not provide the full range of required languages for the forms. (See discussion at end of this chart).
Is the information that is to be inserted into Notices of Action translated into the client's primary language?	X			

Question	Yes	No	Some-times	Comments
Does the county provide auxiliary aids and services, telecommunication devices for the deaf (TDDs) and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Publication 13)?			X	<p>Each office does have assigned customer service representatives, who are actively involved in the reception area. These staff members are available to assist any disabled individual. There is expedited processing provided for these individuals as well, to prevent them from having to stand in long lines.</p> <p>Several of the staff interviewed mentioned that they would use large fonts or expand written material on the copy machine for the visually impaired and sign language interpreters could be utilized if necessary for the hearing impaired. Magnifying glasses were also mentions as a means to assist those who had difficulty reading the written material.</p>
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			In the course of processing, staff assist those clients who cannot read or write by reading to them and helping with the completion of forms.
Does the county offer screening for learning disabilities?	-	-	-	There are no procedures for routine screening for learning disabilities in the eligibility process. The employment services staff would complete this screening.
Is there an established process for offering screening?	-	-	-	The offer is made as part of the initial assessment process in employment program.

Question	Yes	No	Some-times	Comments
Is the client identified as having a learning disability referred for evaluation?	-	-	-	In the employment services programs, either co-located staff or referrals would be processed.

Discussion: Provision of Written Language Services/ Use of Translated Forms

As in prior years, the 2008 review of LADPSS provision and use of translated forms revealed a continuing deficiency when system generated (LEADER) forms are involved. Enhancements have not been made to that system to ensure that the appropriate designated translation is provided to non-English/non-Spanish speaking participants when forms are sent directly from LEADER. The most significant example is the quarterly income report (QR 7). LEADER continues to have the capability of providing only English and Spanish versions of this form that is routinely utilized in determining continuing eligibility for benefits. Unlike the Notice of Action Form (NOA), where there is a LEADER enhancement that alerts a worker when an English NOA form has been sent and they need to follow up with a translated version, the English QR 7's simply go into the mail with no alert to the worker and no supervisory tracking of follow up by the caseworker.

Practices by workers varied among offices, with many workers indicating during interview that at intake and annual review, they provide the non-English speaking participants with a year's supply of the translated QR 7 to utilize throughout the year (assuming that they will put them in a safe place where they can find them when needed). When the LEADER system automatically sends them an English QR7,, this is to serve as an "alert" that it is time to retrieve one of their own translated versions that they have been given and send it in. There are also Customer Service representatives in each lobby to assist individuals who may come into the office for assistance with the form they receive. Other workers indicated that if a participant calls, a translated QR 7 will be mailed to them to replace the English version already received. Overall, the distribution and processing of translated quarterly income reports is substantially inadequate and fragmented. This may be resulting in the temporary interruption of benefits to the participant and certainly additional workload for the caseworkers who must then restore benefits to those terminated participants who actually remain eligible or reapply.

Thus far, the discussion has been directed toward the quarterly income reports (QR 7); but there are other major forms that were not seen in translated version in the non-English-speaking cases reviewed. The application, SAWS 1, is only provided in English. Following an interactive process with information entered into the computer system, a hard copy SAWS 1 is generated for the participant to sign. He/she is also provided a copy of this document. Again, because the system only generates English versions of the SAWS 1 (no Spanish or other languages), everyone receives an English SAWS 1. The SAWS 2 (basis for the statement of facts) was found in the Spanish cases, but no other translated SAWS 2 forms were found.

B. Corrective Actions

Area of Findings	Corrective Actions
Provision of Language Services (Translated Forms)	LEADER System enhancements are needed to ensure that Los Angeles County DPSS provides appropriate and timely translated materials in the clients' primary languages when those materials are translated by CDSS. Div. 21-115.2

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

For each documentation item, the location and/or form where the item is documented in the case file is noted. Instances where the case review sample did not contain evidence of the documentation item, the information is based on worker interviews.

Documentation Item	CalWORKs	Food Stamps (NAFS)
Ethnic Origin	SAWS 1	DFA 285 A1 or SAWS 1
Primary language	Saws 1 & Form PA 481	DFA 285 A1, SAWS 1 & Form PA 481
Method of providing bilingual services	Case Comments in LEADER	Case Comments in LEADER
Client provided own interpreter	Case Comments (None in sample reviewed)	Case Comments (None in sample reviewed)
Method to inform client of potential problem of ineffective communication using own interpreter	Verbal discussion is held according to Eligibility Workers, and use of PA 481A	Verbal discussion is held according to Eligibility Workers, and use of PA 481A

Release of information to Interpreter	PA 481 A	PA 481 A
Individual's acceptance or refusal of written material offered in primary language	PA 481	PA 481
Translated NOAs contain translated inserts	Information inserted on Notice of Action as necessary	Information inserted on Notice of Action as necessary
Documentation of minor used as interpreter	N/A	N/A
Method of identifying client's disability	Case Comments (No sample cases)	Case Comments (No sample cases)
Method of documenting a client's request for auxiliary aids and services.	Case Comments (No sample cases)	Case Comments (No sample cases)

Additional Comments

There was overall consistency in format of the case comment entries that provides evidence of training and oversight of the documentation of language services. In last year's report, specific reference was made to the improvement noted in this area and that improvement continues to be evident. The standardized format and content of entries related to service by a certified bilingual worker was found in the 2008 review. Bilingual workers appear to understand the need for documenting their role as interpreter in their own non-English speaking cases.

B. Corrective Actions

No specific corrective action appears necessary with respect to case documentation. Continued monitoring and oversight is recommended to ensure ongoing compliance.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the CWS workers have an understanding of MEPA (Multi-Ethnic Placement Act)?				N/A (A separate Department of Children and Family Services provides these services in Los Angeles County).
Interview questions	Yes	No	Some-times	Comments
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

Comments: In addition to the traditional staff development programs, that include scheduled periodic training presentation, the Civil Rights Unit in LADPSS has developed some innovative means to keep staff aware of their responsibilities in maintaining compliance with the program and to establish an open line of communication between the central Civil Rights Unit and all of the districts.

Each district office has a designated civil rights liaison who coordinates the civil rights activities in their office. During interviews it was evident that staff were well aware of this person and viewed him/her as a valuable resource on civil rights matters. The liaison coordinates with the Civil Rights Unit and provides direction to staff in the district on matters pertaining to civil rights.

There is also an active presence of LADPSS Civil Rights headquarters staff in the district offices through a program of monitoring and local review. LADPSS civil rights staff conduct file reviews much like those conducted in the annual Civil Rights compliance reviews by CDSS and provide feedback and consultation with district managers regarding compliance with specific civil rights (Division 21) requirements. It is the opinion of this reviewer that those oversight activities have accounted for the major improvements of the case documentation and staff awareness of Division 21 requirements.

B. Corrective Actions

No corrective action is necessary. LADPSS is commended for their work in the area of staff development and are encouraged to continue in their efforts.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. The Civil Rights Coordinator primarily uses this log once complaints get to him/her.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			They knew both the LADPSS Civil Rights Coordinator and the district's liaison.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			

Interview and review areas	Yes	No	Some-times	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	-	-	-	The complaint log has been forwarded to the assigned analyst in the Civil Rights Bureau for review.

B. Corrective Action:

None Required

IX. CONCLUSION

Los Angeles County Department of Public Social Services (DPSS) was found to be in overall compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws. The districts represented in the 2008 compliance review reflected clear evidence of the ongoing efforts to provide appropriate and effective service to participants regardless of language preference or disability. As discussed in various sections of this report, the ongoing local monitoring provided by the LADPSS Civil Rights and Customer Relations Section appears to have substantially improved the level of compliance with Division 21 requirements. To the degree that managers and supervisors in the individual districts remain responsive to those efforts, and provide oversight, ongoing compliance will be maintained. Representatives from that LADPSS Civil Rights and Customer Relations Section actively participated throughout the 2008 review, as they had in 2007. This not only provided valuable assistance to the CDSS reviewer, but also served as training for the LADPSS staff in their local ongoing monitoring of the Civil Rights Programs in the district offices. Open discussion was held with district administrative staff, both during the site review and at the exit meeting, which also served to enhance the review and provide the opportunity for feedback.

There was one major issue regarding the use of translated forms that was discussed in Section V, PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES. LADPSS must address this issue in order to ensure that non-English speaking participants who request forms in their primary language are appropriately provided those forms (when made available by CDSS). There has been progress in this area, but additional effort is needed to attain appropriate compliance.

Los Angeles County DPSS must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.